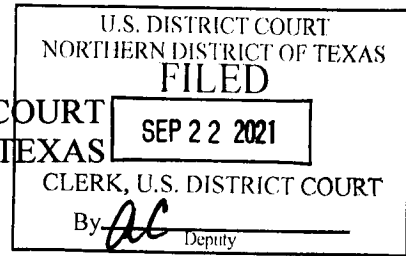


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION



UNITED STATES OF AMERICA

v.

DON ERIC WOLTERS (01)
WILLIAM DANIEL HASKINS (02)
ALLEN CHASE WATSON (03)
a/k/a "Ghost"
KRISTEN NICOLE ARCENEUX (04)

FILED UNDER SEAL

No. **2-21CP-078-Z**

GOVERNMENT'S MOTION TO SEAL INDICTMENT

The United States of America ("the government"), by and through the United States Attorney for the Northern District of Texas, moves for an order sealing the indictment returned by the grand jury in the above-captioned criminal case. The government requests that the indictment remain sealed until such time as all defendants are apprehended and all have made an initial appearance in federal court, or until further order of the Court. The government believes that the public release of the names of indicted defendants who have not been apprehended would undermine the pursuit of justice.

The government, however, requests that the case against an individual defendant be unsealed upon that defendant's apprehension or initial appearance in federal court. The government also requests that it be allowed to provide an apprehended defendant with a copy of the indictment that redacts the names of other defendants who have not

been apprehended, as well as any charge that does not affect the apprehended defendant.

Respectfully submitted,

PRERAK SHAH
ACTING UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Anna Marie Bell", written over a horizontal line.

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